RECORDED NEVADA WOSB ACTIVE ABSENCE THRESHOLD TRAINING DOCUMENTATION

Assessment Area 1. Security Awareness Training Record Coverage

WOSB-designated contractors operating in Nevada under active federal awards do not uniformly maintain security awareness training records at a level consistent with Active FCI Posture Record requirements under FAR 52.204-21. Relative to organizations at higher revenue thresholds within the same certification class, the proportion of this population in which training records reflect the current personnel roster and the current FCI boundary is lower. Documentation review activity operating under prime contractor relationships observes that between 55 and 70 percent of organizations in this population file training completion records at the point of initial onboarding without confirming those records against subsequent personnel changes or boundary modifications. The record either reflects the present FCI scope or it does not reflect it. Where training records exist, they address the workforce composition as it was configured at the time training was last conducted. Neither resolves the other in the current record state. The training record and the current personnel roster coexist without reconciliation. Against what documentation capacity looks like at larger organizational scales, this population's training documentation reflects a condition in which completion records are filed but not maintained across assessment intervals.

Assessment Area 2. Training Record Accuracy and Personnel Correspondence

Comparable organizations within the same certification and threshold profile exhibit a condition in which training records address the organization's workforce as it existed at a prior point. Documentation either addresses the current state or it addresses a prior one. Personnel additions since the last training cycle do not appear in the training completion record. Personnel departures are not reflected in the access revocation documentation that corresponds to the training record. Relative to contractors at higher revenue classifications where dedicated compliance personnel maintain training rosters, WOSB organizations in Nevada at lower size thresholds rely on the same individual for training administration, record maintenance, and operational management. The two states are simultaneously observable in the record. A training completion record exists. The record does not correspond

to the current workforce. Documentation that reflects the environment as it existed before the most recent change remains the operative record. The absence of current training documentation across the workforce is observable at the point of review. Documentation review activity operating under prime contractor relationships does not reconstruct training histories from source records. It observes what the record contains and what it does not contain at the time of assessment.

Assessment Area 3. Population Threshold and Record State

The record carries the current environment or it does not. Against what comparable organizations at equivalent thresholds maintain, the Nevada WOSB population's training documentation does not reach the present environment at a rate consistent with Active Documented Compliance. Each condition is present and neither cancels the other. More than half of organizations within this population maintain a training completion record that addresses fewer personnel than currently operate within the FCI boundary. Documentation carrying a configuration the current environment has moved past continues as the operative training record. The gap between what the record shows and what the current environment contains is present across assessment cycles. The record contains documentation. The documentation does not reach the present threshold.